

Magistrate Judge Mary Alice Theiler

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AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIMOTHY GEORGE DORAN,

Defendant.

CASE NO. MJ11-496

COMPLAINT FOR VIOLATION

Title 18, U.S.C., Section 2250

BEFORE The Honorable Mary Alice Theiler, United States Magistrate Judge, U.S. Courthouse,  
Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**  
**(Failure to Register and Update Sex Offender Registration)**

Beginning on a date unknown, but sometime after October 8, 2009, and continuing until  
the present, in King County, within the Western District of Washington, and elsewhere, the  
defendant, TIMOTHY GEORGE DORAN, a sex offender who is required to register and update  
sex offender registration pursuant to the Sex Offender Registration and Notification Act, and  
who traveled in interstate or foreign commerce, did knowingly fail to register and update his  
sexual offender registration.

All in violation of Title 18, United States Code, Section 2250.

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1 The undersigned complainant being duly sworn further states:

2 1. I, Lisa Stephenson, am a Senior Criminal Investigator and Deputy United States  
3 Marshal assigned to the Seattle, Washington office. I have been employed by the United States  
4 Marshals Service for over nineteen years. I graduated from the United States Marshals Service  
5 Academy and the Federal Law Enforcement Training Center for Criminal Investigators. I am a  
6 Senior Inspector for the Sex Offender Investigations Branch for the United States Marshals  
7 Service, Western District of Washington, Seattle Division. One of my responsibilities is to  
8 investigate crimes involving individuals who are convicted sex offenders and who have failed to  
9 register or update their information as required by the Sex Offender Registration and  
10 Notification Act ("SORNA") (codified at Title 42, United States Code, Section 16901, *et seq.*).

11 2. This affidavit is made in support of a criminal complaint charging TIMOTHY  
12 GEORGE DORAN with failure to register and update his sex offender registration, in violation  
13 of Title 18, United States Code, Section 2250. The information set forth below has come from  
14 either personal investigation or has been related to me personally by other law enforcement  
15 officers associated with this investigation.

16 **I. DEFENDANT'S SEX OFFENDER STATUS**

17 3. On or about June 29, 1992, TIMOTHY GEORGE DORAN was convicted in  
18 Pierce County of Rape in the Second Degree, in violation of RCW 9A.44.050, and was  
19 sentenced to serve 89 months of imprisonment. Because Rape in the Second Degree is a Class A  
20 felony, TIMOTHY GEORGE DORAN is required to register as a sex offender for life.

21 4. Federal law requires that any "sex offender" must "register, and keep the  
22 registration current, in each jurisdiction where the offender resides, where the offender is an  
23 employee, and where the offender is a student." 42 U.S.C. § 16913(a). Keeping the registration  
24 current is defined as "not later than 3 business days after each change of name, residence,  
25 employment or student status, appear in person in at least 1 jurisdiction involved pursuant to  
26 subsection (a) of this section and inform that jurisdiction of all changes in the information  
27 required for that offender in the sex offender registry." 42 U.S.C. § 16913(c). "Sex offender" is  
28 defined as including anyone who has committed "(i) a criminal offense that has an element

1 involving a sexual act or sexual contact with another” or “(ii) a criminal offense that is a  
2 specified offense against a minor.” 42 U.S.C. § 16911(5). Based on the foregoing, TIMOTHY  
3 GEORGE DORAN is a sex offender who is required to register and update his registration  
4 information.

## 5 **II. DEFENDANT’S FAILURE TO REGISTER**

6 5. As part of his sentencing on June 29, 1992, TIMOTHY GEORGE DORAN signed  
7 a Judgment and Sentence, confirming that he must register as a sex offender within 30 days of  
8 his release in the county of his residence.

9 6. On or about April 26, 1999, TIMOTHY GEORGE DORAN was released from the  
10 Washington Department of Corrections. TIMOTHY GEORGE DORAN signed King County  
11 Sheriff’s Office Sex Offender Registration Notification form, confirming his understanding of  
12 the Sex Offender Registration process which requires, among other things, that:

13 a. if you move to a new address within the same county, you must send  
14 written notice of the change of address to the county sheriff at least 14 days before moving.

15 b. if you move to a new county, you must send written notice of the change of  
16 address at least 14 days before moving to the county sheriff in the new county of residence and  
17 must register with that county sheriff within 24 hours of moving. You must also send written  
18 notice within 10 days of the change of address in the new county to the county sheriff with  
19 whom you last registered.

20 c. If you move out of Washington State, you must also send written notice  
21 within 10 days of moving to the new state or foreign country to the county sheriff with whom  
22 you last registered.

23 7. Records of the King County Sheriff’s Department Sex Offender Unit further  
24 revealed TIMOTHY GEORGE DORAN submitted the King County Sheriff’s Office Sex  
25 Offender Registration Notification forms on May 14, 2001, March 15, 2004 and January 12,  
26 2007. TIMOTHY GEORGE DORAN signed each form, acknowledging his understanding of  
27 sex offender registration requirements.  
28

1           8.     On October 8, 2009, TIMOTHY GEORGE DORAN signed a Registered  
2 Sex/Kidnaping Offender Registration form notifying the King County Sheriff's Department that  
3 he had moved from an address in Renton, Washington to an address in Seattle, Washington (the  
4 "Seattle Address"). King County did not receive any subsequent notification that TIMOTHY  
5 GEORGE DORAN had moved.

6           9.     On January 1, 2011, Seattle Police Officer Timothy Fields visited the Seattle  
7 Address in an attempt to verify if TIMOTHY GEORGE DORAN was residing at the residence.  
8 Officer Fields contacted the property owner, H.V., who stated that TIMOTHY GEORGE  
9 DORAN had moved out of the residence approximately six months ago.

10          10.    On October 3, 2011, H.V. was interviewed again by the undersigned. He stated  
11 that TIMOTHY GEORGE DORAN told H.V. that he (TIMOTHY GEORGE DORAN) was  
12 moving to Vietnam to live with a woman named T.L. H.V. stated that TIMOTHY GEORGE  
13 DORAN borrowed a truck from a friend to move out his belongings. H.V. stated that he does  
14 not remember when TIMOTHY GEORGE DORAN moved out, although H.V. remembered that  
15 it was a month or two after TIMOTHY GEORGE DORAN had an altercation with his sister,  
16 which prompted the police to respond to the Seattle Address. Based on my review of Seattle  
17 Police Department incident # 2010177092, the police were called to the Seattle Address on May  
18 28, 2010; the report listed H.V. as a witness.

19          11.    H.V. stated that, about three months after TIMOTHY GEORGE DORAN moved  
20 out of the Seattle Address, TIMOTHY GEORGE DORAN called H.V. and told him to tell law  
21 enforcement that he still resided at the Seattle Address. When H.V. told him that he would not  
22 do that, TIMOTHY GEORGE DORAN stated that he was supposed to be residing at the Seattle  
23 Address after getting in trouble for hitting his wife. H.V. did not know that TIMOTHY  
24 GEORGE DORAN was a sex offender.

25          12.    On August 24, 2011, a query of records from U.S. Customs & Border Protection  
26 disclosed the following travel records regarding TIMOTHY GEORGE DORAN:

27               a.    On August 29, 2010, TIMOTHY DORAN traveled from Seattle,  
28 Washington to Taipei, Taiwan.

1           b.       On September 11, 2010, TIMOTHY DORAN traveled from Taipei,  
2 Taiwan to Seattle, Washington.

3           c.       On October 30, 2010, TIMOTHY DORAN traveled from Seattle,  
4 Washington to Inchon, South Korea.

5           d.       On March 9, 2011, TIMOTHY DORAN traveled from Taipei, Taiwan to  
6 Seattle, Washington.

7       13.       Public databases confirm that TIMOTHY GEORGE DORAN has not registered as  
8 a sex offender in other jurisdictions. On September 27, 2011, a query of the Department of  
9 Justice, Dru Sjodin National Sex Offender Public Website disclosed TIMOTHY GEORGE  
10 DORAN was currently registered at the Seattle Address. The website maintains records of sex  
11 offenders located nationwide. On the same date, a query of the Washington Association of  
12 Sheriffs and Police Chiefs Sex Offender Website listed TIMOTHY GEORGE DORAN as a  
13 non-compliant offender, last known to be residing at the Seattle Address. The website maintains  
14 records of sex offenders located in Washington State.

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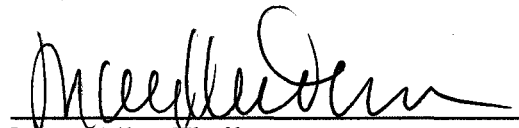
1 **III. CONCLUSION**

2 14. Based on the above facts, I respectfully submit that there is probable cause to  
3 believe that TIMOTHY GEORGE DORAN committed a violation of Title 18, United States  
4 Code, Section 2250, by failing to register and update his sex offender registration status as  
5 required.

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9 Lisa Stephenson, Complainant  
10 Senior Inspector  
United States Marshals Service

11 Based on the Complaint and Affidavit sworn to before me, and subscribed in my  
12 presence, the Court hereby finds that there is probable cause to believe the defendant committed  
13 the offenses set forth in the Complaint.

14 DATED this 13 day of October, 2011

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17 Mary Alice Theiler  
18 United States Magistrate Judge  
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